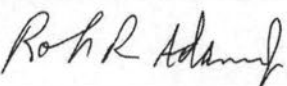
		United States <b>Environmental Protection Agency</b> Washington, DC 20460		<input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Amendment</b> <input type="checkbox"/> <b>Other</b>		OPP Identifier Number	
892 <b>Application for Pesticide - Section I</b>							
1. Company/Product Number <b>82341- R</b>				2. EPA Product Manager Velma Noble		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) <b>EcaFlo Anolyte</b>				PM # 31			
5. Name and Address of Applicant (Include ZIP Code) <b>Integrated Environmental Technologies Ltd</b> <b>c/o Adams Technology Systems</b> <b>5145 Forest Run Trace - Suite B</b> <b>Alpharetta GA 30022-4504</b> <input type="checkbox"/> Check if this is a new address				6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>81206-1</u> Product Name <u>Oculus Microcyn Sanitizer</u>			
<b>Section - II</b>							
<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification - Explain below.				<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input checked="" type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.			
<b>Explanation:</b> Use additional page(s) if necessary. (For Section I and Section II.)							
<b>Section - III</b>							
1. Material This Product Will Be Packaged In:							
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* <b>Certification must be submitted</b>		If "Yes" Unit Packaging wgt.		No. per container		If "Yes" Package wgt.	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container				4. Size(s) Retail Container 1 oz to 1000 gallons		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____			
<b>Section - IV</b>							
1. Contact Person (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)							
Name Rob R. Adams, Jr.				Title Agent		Telephone No. (Include Area Code) 770-751-1073	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.						6. Date Application Received (Stamped)	
2. Signature 				3. Title Agent			
5. Typed Name Rob R. Adams, Jr.				5. Date November 27, 2007			



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Integrated Environmental Technologies LTD	EPA Registration Number/File Symbol 82341-R
Active Ingredient(s) and/or representative test compound(s) Hypochlorous Acid	Date 11/27/2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) 12-Commercial and Industrial Uses 10-Noncrop, wide area, and general indoor/outdoor treatments.	EcaFlo Anolyte

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature <i>Rob R Adams</i>	Date 11/27/2007	Typed or Printed Name and Title Rob R. Adams, Jr. Agent
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
401 M Street, S.W.  
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date <b>November 27, 2007</b>			EPA Reg No./File Symbol <b>82341-R</b>		Page 1 of 3
Applicant's/Registrant's Name & Address <b>Integrated Environmental Technologies LTD c/o Adams Technology Systems 5145 Forest Run Trace - Suite B - Alpharetta GA 30022-4504</b>			Product <b>EcaFlo Anolyte</b>		
Ingredient <b>Hypochlorous Acid - PC129054 - CAS# 7790-92-3</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550 - 61-1	Product Identity and Composition	See CSF	Integrated Environmental Technologies LTD	OWN	
830.1600 - 61-2	Description of the Materials Used to Produce the Product	See CSF	Integrated Environmental Technologies LTD	OWN	
830.1650 - 61-2	Description of the Manufacturing Process	See Attached	Integrated Environmental Technologies LTD	OWN	
830.1670 - 61-3	Discussion of Formulation of Impurities	See Attached	Integrated Environmental Technologies LTD	OWN	
830.1700 - 62-1	Preliminary Analysis	See Attached	Integrated Environmental Technologies LTD	OWN	
830.1750 - 62-2	Certified Limits	See CSF	Integrated Environmental Technologies LTD	OWN	
830.1800 - 62-3	Enforcement Analytical Method	See Attached	Integrated Environmental Technologies LTD	OWN	
830.1900 - 64-1	Submittal of Samples	If requested	Integrated Environmental Technologies LTD	OWN	
	<b>Data Matrix Group B - Physical/Chemical Properties</b>				
830.6302 - 63-2	Color	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6303 - 63-3	Physical State	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6304 - 63-4	Odor	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7200 - 63-5	Melting Point	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7220 - 63-6	Boiling Point	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7300 - 63-7	Density/Relative Density/Bulk Density	Self Certify	Integrated Environmental Technologies LTD	OWN	
Signature <i>Rob R Adams, Jr.</i>			Name and Title <b>Rob R. Adams, Jr.</b> Agent		Date <b>November 27, 2007</b>



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DATA MATRIX

Date <b>November 27, 2007</b>			EPA Reg No./File Symbol <b>82341-R</b>		Page 2 of 3
Applicant's/Registrant's Name & Address <b>Integrated Environmental Technologies LTD c/o Adams Technology Systems 5145 Forest Run Trace - Suite B - Alpharetta GA 30022-4504</b>			Product <b>EcaFlo Anolyte</b>		
Ingredient <b>Hypochlorous Acid - PC129054 - CAS# 7790-92-3</b>					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840 - 63-8	Solubility (Column elution/shake flask)	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7950 - 63-9	Vapor Pressure	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7370 - 63-10	Dissociation Constant	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7550/7560/7570 - 63-11	Partition Coefficient	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.7000 - 63-12	pH	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6313 - 63-13	Stability	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6314 - 63-14	Oxidation/Reduction:Chemical Compatibility	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6315 - 63-15	Flammability	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6316 - 63-16	Explosibility	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6317 - 63-17	Storage Stability	PR Notice 92-5	Integrated Environmental Technologies LTD	OWN	
830.7100 - 63-18	Viscosity	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6319 - 63-19	Miscibility	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6320 - 63-20	Corrosion Characteristics	Self Certify	Integrated Environmental Technologies LTD	OWN	
830.6321 - 63-21	Dielectric Breakdown Voltage	Self Certify	Integrated Environmental Technologies LTD	OWN	
Signature <i>Rob R Adams, Jr.</i>			Name and Title Rob R. Adams, Jr. Agent		Date November 27, 2007



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DATA MATRIX

Date <b>November 27, 2007</b>	EPA Reg No./File Symbol <b>82341-R</b>	Page 3 of 3
Applicant's/Registrant's Name & Address <b>Integrated Environmental Technologies LTD c/o Adams Technology Systems 5145 Forest Run Trace - Suite B - Alpharetta GA 30022-4504</b>	Product <b>EcaFlo Anolyte</b>	

Ingredient **Hypochlorous Acid - PC129054 - CAS# 7790-92-3**

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100 - 81-1	Acute Oral Toxicity	CITE ALL	See attached list of Data Submitters	CITE	
870.1200 - 81-2	Acute Dermal Toxicity	CITE ALL	See attached list of Data Submitters	CITE	
870.1300 - 81-3	Acute Inhalation Toxicity	CITE ALL	See attached list of Data Submitters	CITE	
870.2400 - 81-4	Primary Eye Irritation	CITE ALL	See attached list of Data Submitters	CITE	
870.2500 - 81-5	Primary Dermal Irritation	CITE ALL	See attached list of Data Submitters	CITE	
870.2600 - 81-6	Skin Sensitization	CITE ALL	See attached list of Data Submitters	CITE	

Signature 	Name and Title Rob R. Adams, Jr. Agent	Date November 27, 2007
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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WASHINGTON, D.C. 20460

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**SELF-CERTIFICATION STATEMENT FOR THE  
PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)**

Product Name: EcaFlo Anolyte

Reg. No./File Symbol No. 82341-R  
(if known) or Company No.

**SELF-CERTIFICATION STATEMENT:**

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name):  
Integrated Environmental Technologies Ltd and that the values of the properties reported are reliable.

I further certify that such data was generated in substantial conformity with OPPTS Test Guidelines Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name: Rob R. Adams, Jr.

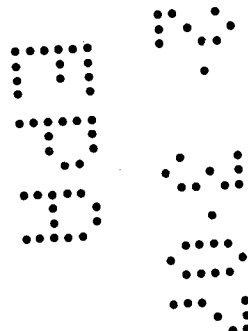
Title: Agent

Telephone No.  
770-751-1073

Applicant's Signature:

*Rob R Adams*

Date:  
11/27/2007





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

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**SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)**

<b>1. PRODUCT NAME:</b> EcaFlo Anolyte		<b>2. Reg. No.</b> 82341-R
<b>3. COMPANY NAME:</b> Integrated Environmental Technologies Ltd		<b>4. SUBMISSION DATE:</b> 11/27/2007
<b>5. FIRST SUBMISSION</b> <input checked="" type="checkbox"/> <b>6. RESUBMISSION</b> <input type="checkbox"/>	<b>7. PESTICIDE TYPE:</b> Antimicrobial	<b>10. REGISTRATION</b> <input type="checkbox"/>
<b>8. FORMULATED MANUFACTURING-USE PRODUCT</b> <input checked="" type="checkbox"/> <b>or 9. END-USE PRODUCT</b> <input type="checkbox"/>		<b>11. REREGISTRATION</b> <input type="checkbox"/>
<b>13. PRODUCT MANAGER OR CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN):</b> Noble - 31		<b>12. REREG CASE #</b>
<b>14. GUIDELINE REFERENCE NO.(GRN)/TITLE</b>	<b>15. VALUE or QUALITATIVE DESCRIPTION/METHOD(s) USED WHERE APPLICABLE AND REFERENCES</b>	<b>16. MRID or REPORT NO.</b> EcaFlo® Anolyte

**Group B, Series 830-Physical and Chemical Properties (40 CFR 158.190)**

-6302	Color	clear	IET EcaFlo® Anolyte
-6303	Physical State	liquid	IET EcaFlo® Anolyte
-6304	Odor	slight "chlorine" odor	IET EcaFlo® Anolyte
-6314	Oxidation/Reduction: Chemical Incompatibility	N/A - Product does not contain Oxidation/Reduction agents	N/A
-6315	Flammability/Flame Extension	N/A - Product is water based or Product is a solid or powder	N/A
-6316	Explosibility	N/A - Product is not considered potentially explosive	N/A
-6317	Storage Stability	As per EPA PR Notice 92-5, Data to be submitted upon request.	IET EcaFlo® Anolyte
-6319	Miscibility	N/A - Product is not an emulsifiable concentrate	N/A
-6320	Corrosion Characteristics	N/A - Product is not corrosive	N/A
-6321	Dielectric Breakdown Voltage	N/A - Product is not intended for use around electrical equipment	N/A
-7000	pH	6.5 (6.01 - 8.16)	IET EcaFlo® Anolyte
-7100	Viscosity	water @ 68°F/20°C	IET EcaFlo® Anolyte
-7300	Density/Relative Density/ Bulk Density	8.36 #/gal or 1.004 g/ml @68°F/20°C	IET EcaFlo® Anolyte



## ADAMS TECHNOLOGY SYSTEMS

5145 FOREST RUN TRACE - SUITE B - ALPHARETTA GA 30022-4504

(770) 751-1073 - FAX (770) 751-1173

E-Mail: AdamsTech@att.net

<b>PREPARED FOR :</b>		<b>EPA Reg# 70108</b>
ROB ADAMS ADAMS TECHNOLOGY SYSTEMS STATE PESTICIDE REGISTRATION SERVICE CENTER 5145 FOREST RUN TRACE-SUITE B ALPHARETTA GA 30022		<b>CURRENTLY ACTIVE:</b> Registrations: 0 Sub Registrations: 0 Sub Registered Companies: 0
PHONE: 770-751-1073	FAX: 770-751-1173	EMAIL: Rob@ATS2.com
The EPA and State data used in this report is updated periodically. ATS updated its database: 10/1/2007		

### PDSL-01: Pesticide Data Submitters List

**PDSL Dated:** 9/30/2007

**PC CODE #** 129054

**CAS #** 7790-92-3

**Common Name:** Hypochlorous Acid

#### Data Submission Code Legend \*

EU - Exclusive Use  
AT - Accute Toxicity

EC - Environmental Chemistry Field Studies  
EF - Efficacy

FW - Fish and Wildlife  
OT - Other Data

\* (Complete code descriptions can be found at the end of this report)

PC CODE	CAS #	COMMON NAME
129054	7790-92-3	Hypochlorous Acid

<b>EPA COMPANY# 81206</b>	<b>(260) 244-6270</b>	<b>AGENT</b>												
SCIENTIFIC & REGULATORY CONSULTANTS, INC. PO BOX 1014 COLUMBIA CITY, IN 46725		Agent for: OCULUS INNOVATIVE SCIENCES, I												
		<table border="1"><tr><td>EU</td><td>AT</td><td>EC</td><td>FW</td><td>EF</td><td>OT</td></tr><tr><td></td><td>AT</td><td></td><td></td><td>EF</td><td>OT</td></tr></table>	EU	AT	EC	FW	EF	OT		AT			EF	OT
EU	AT	EC	FW	EF	OT									
	AT			EF	OT									

SELECTED COMPANIES - TOTAL: 1

\* Description of Data Submission Codes



PC CODE	CAS #	COMMON NAME
129054	7790-92-3	Hypochlorous Acid

EU indicates exclusive Use - Where new chemical (new active ingredients) have been registered since September 30, 1978, the listing designates the applicable data as "exclusive use data" in accordance with section 3(c)(1)(D)(i) of FIFRA. The requestor must write directly to the submitter listed for written permission to use the data.

AT indicates that the applicant has submitted acute toxicity data where the substance tested was a formulated end-use product rather than a technical grade or manufacturing-use product (including acute oral, dermal, inhalation, primary eye and dermal sensitization).

EC indicates that the data submitter has submitted environmental chemistry field studies where the substance tested was required to be the formulated end-use product rather than a technical grade of manufacturing-use product.

EF indicates that the data submitter has submitted efficacy data.

FW indicates that the data submitter has submitted fish and wildlife field studies, where the substance tested was required to be a formulated end-use product rather than a technical grade or manufacturing-use product.

OT indicates that the data submitter has submitted other data, which may be product or residue chemistry, subacute and chronic toxicity data, acute toxicity data using a technical or manufacturing-use product, and/or other fish and wildlife and environmental chemistry studies than set forth above.

NOTE: Data for compiling this report was retrieved directly from as many as 40+ different Federal EPA and State registration databases. This report is an accurate presentation of the data in the EPA files as of the date noted above. Adams Technology Systems cannot and does not make any corrections or changes to the actual information. Any errors noted must be corrected by contacting the EPA or State agency responsible for that database's administration. (Adams Technology Systems would be pleased to handle corrections or changes at standard consulting rates.)

## ADAMS TECHNOLOGY SYSTEMS

5145 FOREST RUN TRACE - SUITE B • ALPHARETTA GA • 30022-4504

PHONE: (770) 751-1073 • FAX: (770) 751-1173

www.AdamsTechnology.com • Email: AdamsTech@ATS2.com

November 27, 2007

Oculus Innovative Sciences Inc  
c/o Scientific & Regulatory Consultants Inc  
PO Box 1014  
Columbia City IN 46725

### Re: Offer to Pay Compensation

On behalf of our client, **Integrated Environmental Technologies LTD**, we are in the process of submitting to the U.S. Environmental Protection Agency a FIFRA Section 3 registration using the cite-all option under the selective method in accordance with Sections 3(c)(1)(F) and 3(c)(2)(B) of FIFRA for the following product(s): **EcaFlo Anolyte**

As per the latest EPA Pesticide Data Submitter List (PDSL-09/30/2007) your company has submitted data in support of one or more of the following active ingredient(s):

#### **Hypochlorous Acid – CAS# 7790-92-3**

The Applicant offers to pay reasonable compensation to the extent provided under Section 3(c)(1)(F) and Section 3(c)(2)(D) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, and in accordance with the Regulations and Guidelines published there under.

Compensation, if any, may be due for use of test data and studies which has been submitted to the U.S. Environmental Protection Agency in support of an application for the registration, and which may be used in support of the registration application for the subject product. We offer to commence negotiations with you to ascertain the amount and terms of compensation, if any, for data generation.

Please respond indicating your request for compensation, if any, and the terms of data generation costs' compensation, if any, and the terms of compensation, if required. Please provide us with the following information and documentation so that we may properly evaluate your compensation request.

1. Study Title and EPA Guideline Numbers satisfied
2. Study Formulation (AI with label percentage and list of inert ingredients)
3. Study Laboratory and Author
4. Study Completion Date (if more than 15 years ago, no compensation is due)
5. Date submitted to the EPA and MRID Number(s) assigned
6. EPA Good Laboratory Practice status
7. Copy of the EPA's Core Guideline acceptance and review results
8. Copy of Invoice(s) to show the cost of each study
9. Copy of the terms and amount of compensation previously received
10. List of any current compensation negotiations being conducted

If no response is received within 30 days, we will assume that no compensation is requested. We look forward to negotiating a mutually satisfactory agreement. Thank you for your prompt response to our offer.

Sincerely:

Adams Technology Systems



Rob R. Adams, Jr.

Agent for Integrated Environmental Technologies LTD